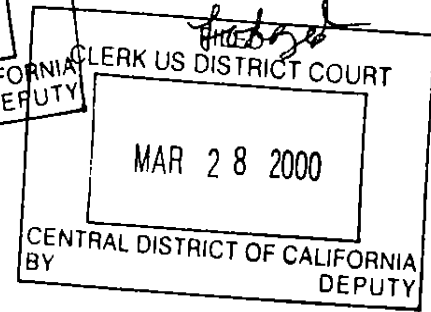
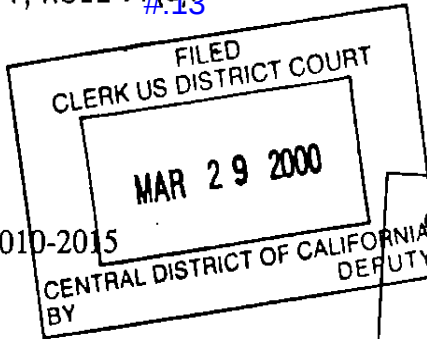
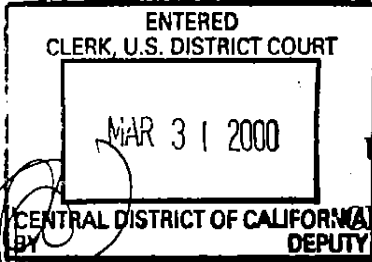


HUGH R. MANES  
MANES & WATSON  
3435 Wilshire Boulevard  
Suite 2900  
Los Angeles, California 90010-2015  
Telephone: (213) 381-7793



Attorneys for plaintiffs Brian Bowne Scott and  
Stephanie Allison Scott, minor



UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

FRANCES SCOTT, et al.,  
Plaintiffs,  
vs.  
SHERMAN BLOCK, et al.,  
Defendants.

CASE NO. CV 93-1319 DT  
Consolidated with CV 95-6931 DT and  
CV 93-3830 DT

INTRA - PLAINTIFF AGREEMENT AS TO  
APPORTIONMENT OF SETTLEMENT  
PROCEEDS AND ORDER

Come now plaintiffs FRANCES SCOTT, BRIAN BOWNE SCOTT, STEPHANIE SCOTT,  
a minor, by her guardian ad litem, Karen Scott, SUSAN SCOTT, DENISE SCOTT, and ESTATE  
OF DONALD SCOTT, by their respective counsel of record, and represent to the Court that  
agreement has been reached by, between and among all plaintiffs to apportion the global settlement  
in the within consolidated cause, as set forth below.

I HEREBY CERTIFY THAT THIS DOCUMENT WAS SERVED BY  
FIRST CLASS MAIL, POSTAGE PAID, TO ALL  
(OF PARTIES) AT THEIR RESPECTIVE, MOST RECENT ADDRESS OF  
RECORD, IN THIS ACTION, ON

DATED

MAR 31 2000

PREAMBLE

DEPUTY CLERK

The global settlement in this case is \$5,000,000.00, one fifth of which is being paid by the  
defendant UNITED STATES OF AMERICA, and the other four-fifths of which is being paid by  
the defendant COUNTY OF LOS ANGELES.

An equal division of the settlement proceeds among the six plaintiffs in this consolidated  
action would result in a gross distributive share to each in the sum of \$833,334.

✓ Docketed  
✓ Copies / NTC Sent  
JS - 5 / JS - 6  
JS - 2 / JS - 3  
CLSD

1           However, plaintiffs and their counsel each recognize that the legal work, research and legal  
2 services done and performed by the attorneys for plaintiff FRANCES SCOTT significantly exceeds  
3 that done by attorneys for the remaining plaintiffs so that an adjustment needs to be made in the  
4 distribution to compensate said plaintiff and her attorneys therefor.

5           Accordingly, plaintiff SUSAN SCOTT and DENISE SCOTT agree to yield portions of their  
6 respective shares, and attorneys for BRIAN SCOTT and STEPHANIE SCOTT agree to yield a  
7 portion of their fees to plaintiff FRANCES SCOTT, which adjustments are reflected in the agreed  
8 apportionment and distribution set forth below:

9           1.     Plaintiff FRANCES SCOTT to receive the gross sum of \$1,149,833.33, from which  
10 gross sum shall be deducted all costs and attorneys fees pursuant to and in accordance with the  
11 retainer agreement between said plaintiff and her counsel of record in the within consolidated cause.

12           2.     Plaintiff BRIAN BOWNE SCOTT to receive the gross sum of \$791,750.00, from  
13 which the following shall be deducted and paid to the law firm of MANES & WATSON, counsel  
14 of record for said plaintiff, to wit:

15  
16                   a)     One half of costs incurred in the within consolidated action if the sum of  
17                               \$4,871.28

18                   b)     Attorneys fees totaling \$472,224, of which the sum of \$41,584 shall be  
19                               relinquished and paid to plaintiff Frances Scott and her attorneys of record.

20           3.     Plaintiff STEPHANIE ALLISON SCOTT to receive the gross sum of \$791,720.00,  
21 from which gross sum the following costs and attorneys fees shall be deducted, subject to the  
22 approval of the Court:

23                   a)     One half costs incurred in the within consolidated action in the sum of  
24                               \$4,871.28

25                   b)     Attorneys fees totaling \$208,334, of which the sum of \$41,584 shall be  
26                               relinquished and paid to plaintiff Frances Scott, and her attorneys of record.

27           4.     Plaintiff DENISE SCOTT, and through her guardian ad litem, Rosalyn Scott, to  
28 receive the gross sum of \$725,333.33, from which gross sum costs and attorneys fees shall be

deducted and paid to said plaintiff's attorneys of record, to wit: STEINER & SAFFER, pursuant to and in accordance with their retainer agreement;

5. Plaintiff SUSAN ALYS SCOTT, to receive the gross sum of \$708,833.34, from which gross sum costs and attorneys fees shall be deducted and paid to said plaintiff's attorneys of record, to wit: LONGO & LONGO, LLP; pursuant to and in accordance with their retainer agreement.

6. Plaintiff ESTATE OF DONALD SCOTT is to receive the gross sum of \$833,000.00, from which shall be deducted and paid to said plaintiff's attorneys of record, to wit: SCHONBRUM, DE SIMONE, SEPLOW, HARRIS & HOFFMAN, LLP, costs and attorneys fees pursuant to and in accordance with their retainer agreement.


KAREN SCOTT, the guardian ad litem for plaintiff STEPHANIE ALLISON SCOTT is authorized to invest up to eighty percent (80%) of said plaintiff's net settlement share in a 20 year life annuity; and the balance to be paid into a blocked interest paying account at a court appointed banking institution until her twenty-first birthday, at which time all funds and annuities shall be turned over to said plaintiff's possession and control.

We, the undersigned counsel of record for the above specified plaintiffs herewith agree to and approve the foregoing.

DATED: March 28, 2000

MANES & WATSON

By

  
HUGH R. MANES  
Attorneys for Brian Bowne Scott  
and Stephanie Allison Scott

DATED: March \_\_\_\_, 2000

COCHRAN, CHERRY, GIVENS,  
SMITH & FERRER, P.C.

By

ERIC G. FERRER

1 deducted and paid to said plaintiff's attorneys of record, to wit: STEINER & SAFFER, pursuant  
2 to and in accordance with their retainer agreement;

3 5. Plaintiff SUSAN ALYS SCOTT, to receive the gross sum of \$708,833.34, from  
4 which gross sum costs and attorneys fees shall be deducted and paid to said plaintiff's attorneys of  
5 record, to wit: LONGO & LONGO, LLP; pursuant to and in accordance with their retainer  
6 agreement.

7 6. Plaintiff ESTATE OF DONALD SCOTT is to receive the gross sum of \$833,000.00.  
8 from which shall be deducted and paid to said plaintiff's attorneys of record, to wit:  
9 SCHONBRUM, DE SIMONE, SELOW, HARRIS & HOFFMAN, LLP, costs and attorneys fees  
10 pursuant to and in accordance with their retainer agreement.

11 KAREN SCOTT, the guardian ad litem for plaintiff STEPHANIE ALLISON SCOTT  
12 is authorized to invest up to eighty percent (80%) of said plaintiff's net settlement share in a 20  
13 year life annuity; and the balance to be paid into a blocked interest paying account at a court  
14 appointed banking institution until her twenty-first birthday, at which time all funds and annuities  
15 shall be turned over to said plaintiff's possession and control.

16 We, the undersigned counsel of record for the above specified plaintiffs herewith  
17 agree to and approve the foregoing.

18  
19 DATED: March 27, 2000

MANES & WATSON

20 By 

HUGH R. MANES  
Attorneys for Brian Bowne Scott  
and Stephanie Allison Scott

21  
22  
23 DATED: March 27, 2000

COCHRAN, CHERRY, GIVENS,  
SMITH & FERRER, P.C.

24 By 

JOHN R. COCHRAN  
John R. Cochran

Mar. 29 2000 12:13PM PS

03/29/00 TEL 00 04 FAX 2123910024

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1 DATED: March 28, 2000

STEINER &amp; SAFFER

By

DAVID P. STEINER  
Attorneys for Plaintiff Denise Scott

5 DATED: March \_\_\_, 2000

SCHONBRUN &amp; DE SIMONE

By

MICHAEL SEPLOW  
Attorneys for Estate of  
Donald Scott

10 DATED: March \_\_\_, 2000

LONGO &amp; LONGO, LLP

By

FRANK J. LONGO  
Attorneys for Plaintiff  
Susan Alice Scott

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PAGE 04

STEINER &amp; SAFFER

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1 DATED: March \_\_\_\_, 2000

STEINER & SAFFER

2  
3 By

DAVID P. STEINER  
Attorneys for Plaintiff Denise Scott

4  
5 DATED: March 28, 2000

SCHONBRUN & DE SIMONE

6  
7 By

  
MICHAEL SEPLOW  
Attorneys for Estate of  
Donald Scott

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9  
10 DATED: March \_\_\_\_, 2000

LONGO & LONGO, LLP

11  
12 By

FRANK J. LONGO  
Attorneys for Plaintiff  
Susan Alys Scott

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1 DATED: March \_\_\_\_, 2000

STEINER & SAFFER

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By

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DAVID P. STEINER  
Attorneys for Plaintiff Denise Scott

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5 DATED: March \_\_\_\_, 2000

SCHONBRUN & DE SIMONE

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By

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MICHAEL SEPLOW  
Attorneys for Estate of  
Donald Scott

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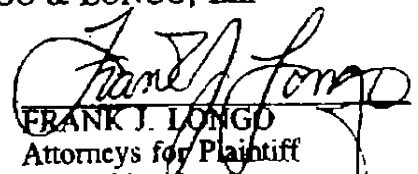
10 DATED: March 28, 2000

LONGO & LONGO, LLP

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By

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FRANK J. LONGO  
Attorneys for Plaintiff  
Susan Alys Scott

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**ORDER RE DISTRIBUTION OF SETTLEMENT PROCEEDS**

The Court, having read the attached Intra-Plaintiff Agreement apportioning the proceeds of the global settlement proceeds being in the sum of \$5,000,000.00, herewith approves the provisions thereof in their entirety, including those relating to the distributive share of plaintiff STEPHANIE ALLISON SCOTT, a minor; and accordingly,

IT IS ORDERED, ADJUDGED AND DECREED that said global settlement proceeds be apportioned, distributed and paid to plaintiffs and to their respective counsel of record in accordance with the terms and conditions thereof.

DATED: \_\_\_\_\_

**MAR 29 2000**

**DICKRAN TEVRIZIAN**

\_\_\_\_\_  
DICKRAN TEVRIZIAN  
JUDGE OF THE UNITED STATES  
DISTRICT COURT